UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th St, Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

April 6, 2011

Mr. Walt Allen
Ashland District Ranger
P.O. Box 168
Ashland, Montana 59003

Re: CEQ # 20110083; EPA Comments on Beaver Creek Landscape Management Project Final EIS and ROD

Dear Mr. Allen:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the Ashland Ranger District, Custer National Forest, Beaver Creek Landscape Management Project in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. 4231 and Section 309 of the Clean Air Act.

The Ashland Ranger District, Custer National Forest, proposes to implement Alternative B for the Beaver Creek Landscape Management Project (BCLMP) involving treatment of 10,508 acres through a combination of commercial timber harvest (on 2,487 acres producing 21,803 hundred cubic feet (CCF) of harvested timber), noncommercial thinning (4,428 acres of mastication thinning and hand thinning with and without fire), and prescribed fire (8,054 acres). Approximately 3,594 acres would be treated only by prescribed fire, and 4,460 acres would be treated by a combination of commercial/noncommercial treatment and prescribed fire. Alternative B includes 15.2 miles on new temporary roads, reconstruction and maintenance on 12.8 miles of existing road, decommissioning of 2.1 miles of road, and seasonal closures of roads #41338 and #44094 to promote big game security.

While EPA has environmental concerns about potential impacts of the proposed project, particularly the proposed construction of 15.2 miles of new temporary roads, we also recognize the need to address vegetative conditions to reduce fire risks, reduce susceptibility to insect and disease agents, and improve forest health. We understand that the BCLMP area is designated as a "Community at Risk" from wildfire, and that a County Wildfire Protection Plan has been developed to reduce fuel loads and fire risk in the area. We also recognize that land management

decisions involve environmental and resource management tradeoffs (i.e., trade-offs in impacts among vegetation treatments, restoration of vegetative conditions, fire risk and fuels, forest health, wildlife, water quality and fisheries, air quality, weed spread, and other resource impacts). We are pleased that the preferred alternative includes 3 miles less road construction than the proposed action, and that all temporary roads would be obliterated following treatment, and two seasonal road closures are included to reduce wildlife security concerns during hunting season. We also appreciate the proposed decommissioning of 2.1 miles of existing roads, and road BMP improvements.

The EPA encourages minimization of new roads since roads are often the major anthropogenic sediment source adversely affecting hydrology, water quality, and fisheries of streams in National Forests. Roads and motorized uses also can adversely affect wildlife habitat, security and connectivity, promote spread of weeds, and cause other adverse environmental and ecological effects. It will be important that vegetation management activities be carried out in a manner that minimizes adverse environmental effects, improves water quality, and promotes consistency with applicable TMDLs for downstream water quality impaired waters (Otter Creek and the Tongue River).

We also appreciate the inclusion of an air quality impacts analysis in the FEIS to disclose air quality effects from the proposed prescribed burning on 8,054 acres. An air quality impacts analysis is particularly needed since the Town of Lame Deer located 30 miles to the west of the project area is designated a PM 10 non-attainment area, and the Northern Cheyenne Indian Reservation located approximately 15 miles west of the project area is designated as a Class 1 Airshed. The FEIS air quality analysis provides a good summary of air quality rules, guidance and interagency coordination for prescribed burns. The analysis adequately discloses potential PM 2.5 impacts, although emissions of other potential air pollutant parameters such as PM 10 and nitrogen dioxide (NO2) are not addressed. Information on air quality monitoring during prescribed fires, and public notification procedures regarding proposed burns are also lacking. We agree that the BCLMP area lacks confined valleys that restrict air flow, and generally has strong wind gradients and good smoke dispersion characteristics. However, it is still important that residents within the burn area be notified prior to burning activities to allow smoke sensitive people to be aware of potential air quality impacts from burning (i.e., people suffering from respiratory illnesses such as asthma or emphysema, or heart problems).

We also appreciate inclusion of at least some minimal monitoring and adaptive management information in Chapter 2 of the FEIS. Monitoring and adaptive management are an integral part of land management. The actual effects of implementation activities are best determined through project monitoring (i.e., ecological and environmental effects). It is through the iterative process of setting goals and objectives, planning and carrying out projects, monitoring impacts of projects, and feeding back monitoring results to managers so they can make needed adjustments, including additional mitigation if necessary, that adaptive management works. In situations where impacts are uncertain, monitoring programs allow identification of actual impacts, so that adverse impacts may be identified and appropriately

mitigated.

Finally we appreciate inclusion of a section in the FEIS on carbon flux or climate change. We encourage disclosure of climate change information in NEPA documents since it contributes to improved public understanding of the effects of climate change on forest ecosystems and forest management, particularly the effects hotter and drier conditions in stressing trees, increasing the frequency of bark beetle outbreaks, and allowing bark beetles to move northward or higher in elevation and into other ranges of their hosts or the ranges of new potential hosts.

The EPA appreciates the opportunity to review and comment during the NEPA process. If you have any questions please contact Mr. Stephen Potts of my staff in Helena at 406-457-5022 or in Missoula at 406-329-3313 or via e-mail at potts.stephen@epa.gov. Thank you for your consideration.

Sincerely,

Julie A. DalSoglio
Director
Montana Office

cc: Larry Svoboda/Connie Collins, EPA 8EPR-N, Denver